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12

13 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**  
14

ANGELA WILLIAMS; JANE DOE #1; JANE  
15 DOE #2,

16 Plaintiffs,

17 v.

18 STEVE SISOLAK, Governor of Nevada, in his  
official capacity; AARON FORD, Attorney  
19 General of Nevada, in his official capacity;  
THE CITY OF LAS VEGAS; CLARK  
20 COUNTY; NYE COUNTY; WESTERN  
BEST, INC. D/B/A CHICKEN RANCH;  
21 WESTERN BEST LLC; JAMA RASHID;  
MALLY MALL MUSIC, LLC; FUTURE  
22 MUSIC, LLC; PF SOCIAL MEDIA  
MANAGEMENT, LLC; E.P. SANCTUARY;  
23 BLU MAGIC MUSIC, LLC; EXCLUSIVE  
BEAUTY LOUNGE, LLC; FIRST  
24 INVESTMENT PROPERTY, LLC; V.I.P.  
ENTERTAINMENT, LLC; MP3  
25 PRODUCTIONS, INC.; MMM  
PRODUCTIONS, INC.;  
26  
27  
28

CASE NO.: 2:21-cv-01676-APG-VCF

**STIPULATION AND ~~PROPOSED~~**  
**ORDER STAYING DISCOVERY**  
**PENDING RULING ON DISPOSITIVE**  
**MOTIONS**

SHAC, LLC D/B/A SAPPHIRE  
GENTLEMAN'S CLUB AND/OR  
SAPPHIRE; SHAC MT, LLC; and LAS  
VEGAS BISTRO, LLC D/B/A LARRY  
FLYNT'S HUSTLER CLUB,

Defendants.

COME NOW Plaintiffs Angela Williams; Jane Doe #1; and Jane Doe #2, by and through their counsel of record, Hutchison & Steffen, PLLC, Defendants Steve Sisolak, Governor of Nevada and Aaron Ford, Attorney General of Nevada, by and through their counsel of record The Nevada State Attorney General's Office, The City of Las Vegas by and through their counsel of record The Las Vegas City Attorney's Office, Clark County by and through its counsel of record Clark County District Attorney Civil Division, Nye County by and through its counsel of record Thorpe & Swainston, Ltd., Las Vegas Bistro, LLC d/b/a Larry Flynt's Hustler Club by and through its counsel of record Fox Rothschild LLP, Western Best, Inc. d/b/a Chicken Ranch and Western Best LLC by and through its counsel of record Fox Rothschild LLP, SHAC, LLC dba Sapphire Gentleman's Club and/or Sapphire and SHAC, MT, LLC by and through their counsel of record, Casey Wallace, Esq. and William King, Esq. of the alw firm of Wallace & Allen, LLP, and their local counsel of record Lewis Roca Rothgerber Christie, LLP (collectively, the "Parties"), hereby stipulate and agree to the following:

1. The following dispositive motions are currently pending before the Court:

- Defendant Clark County's Motion to Strike or in the Alternative to Dismiss, [ECF 53], joined by Defendants Steve Sisolak and Aaron Ford [ECF 58], City of Las Vegas [ECF 69], Nye County [ECF 71], and Western Best, Inc. d/b/a Chicken Ranch and Western Best LLC) [ECF 99];
- Defendants Western Best, Inc. d/b/a Chicken Ranch and Western Best LLC's Motion to Dismiss [ECF 98]; and
- Defendants SHAC, LLC dba Sapphire Gentleman's Club and/or Sapphire and SHAC, MT, LLC's Motion to Dismiss [ECF 133].

...

- 1           2. The Parties agree that all discovery in this action should be stayed pending resolution  
2           of these dispositive motions currently before the Court.
- 3           3. The Plaintiffs and Defendants Western Best, Inc. d/b/a Chicken Ranch and Western  
4           Best LLC previously agreed that Plaintiffs' Motions for Protective Orders [ECF 2 and  
5           ECF 50] will not be addressed until after the motion to strike and motions to dismiss  
6           are fully adjudicated [ECF 117].
- 7           4. The Parties will agree upon a briefing schedule for protective orders after the Court  
8           rules on all the currently pending dispositive motions.
- 9           5. The Parties will agree upon a revised discovery schedule after the Court rules on all  
10          the currently pending dispositive motions.

11           **IT IS SO STIPULATED.**

12           DATED this 28th day of January, 2022.

13           /s/ Jason D. Guinasso  
14           Jason D. Guinasso, Esq.  
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22           Attorney for Plaintiffs

23           DATED this 28th day of January, 2022.

24           /s/ Joel K. Browning  
25           Joel K. Browning  
26           Clark County District Attorney Civil  
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32           Attorney for Defendant Clark County

              DATED this 28th day of January, 2022.

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              and Western Best, Inc. d/b/a Chicken Ranch

              DATED this 28th day of January, 2022.

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              Steve Sisolak

DATED this 28th day of January,  
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Sapphire and SHAC, MT, LLC*

DATED this 28th day of  
January, 2022.

/s/ Zachary Youngsma

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*Attorneys for Defendant  
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DATED this 28th day  
of January, 2022.

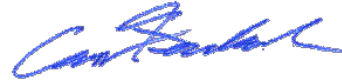
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of Las Vegas*

1 New appearing parties may file a motion to lift the discovery stay or to request that briefing  
2 commence on the motions for protective order, provided that the motion is filed not later than  
thirty days after that party's first appearance.

3 **ORDER**

4 **IT IS SO ORDERED.**

5 

6 \_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE

7 DATED: 1-28-2022  
8 \_\_\_\_\_

**ELECTRONIC CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I hereby certify that on this 28th day of January, 2022, a true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER STAYING DISCOVERY** was electronically filed with the United States District Court. Electronic service of the foregoing document shall be made in accordance with the Master Service List as follows:

**Defendant**

**Steve Sisolak**

*Governor of Nevada*

represented by **Gregory Louis Zunino**

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**Defendant**

**Aaron Ford**

*Attorney General of Nevada*

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(See above for address)

**Defendant**

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**Defendant**

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**Defendant**

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**Defendant**

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